

<i>SERFF Tracking Number:</i>	<i>EMCN-125730119</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>EMC National Life Company</i>	<i>State Tracking Number:</i>	<i>39660</i>
<i>Company Tracking Number:</i>	<i>AR - 10 - 2008</i>		
<i>TOI:</i>	<i>H07I Individual Health - Specified Disease - Limited Benefit</i>	<i>Sub-TOI:</i>	<i>H07I.002 Dread Disease</i>
<i>Product Name:</i>	<i>HP8322 & HP8323 et al</i>		
<i>Project Name/Number:</i>	<i>Version 1.0 Rerate 2008/</i>		

Filing at a Glance

Company: EMC National Life Company	SERFF Tr Num: EMCN-125730119	State: ArkansasLH
Product Name: HP8322 & HP8323 et al	SERFF Status: Closed	State Tr Num: 39660
TOI: H07I Individual Health - Specified Disease - Limited Benefit		
Sub-TOI: H07I.002 Dread Disease	Co Tr Num: AR - 10 - 2008	State Status: Approved-Closed
Filing Type: Rate	Co Status:	Reviewer(s): Rosalind Minor
	Author: Macy Allen	Disposition Date: 09/11/2008
	Date Submitted: 07/17/2008	Disposition Status: Approved-Closed
Implementation Date Requested: 12/01/2008		Implementation Date:
State Filing Description:		

General Information

Project Name: Version 1.0 Rerate 2008	Status of Filing in Domicile: Pending
Project Number:	Date Approved in Domicile:
Requested Filing Mode: Review & Approval	Domicile Status Comments: This filing is currently being reviewed by the Iowa Division of Insurance.
Explanation for Combination/Other:	Market Type: Individual
Submission Type: New Submission	Group Market Size:
Overall Rate Impact: 40%	Group Market Type:
Filing Status Changed: 09/11/2008	
State Status Changed: 09/11/2008	Deemer Date:
Corresponding Filing Tracking Number:	
Filing Description:	
July 16, 2008	

Hon. Julie Benafield Bowman
Commissioner of Insurance

SERFF Tracking Number: EMCN-125730119 State: Arkansas
Filing Company: EMC National Life Company State Tracking Number: 39660
Company Tracking Number: AR - 10 - 2008
TOI: H071 Individual Health - Specified Disease - Sub-TOI: H071.002 Dread Disease
Limited Benefit
Product Name: HP8322 & HP8323 et al
Project Name/Number: Version 1.0 Rerate 2008/

Arkansas Insurance Department
Life and Health Division
1200 West 3rd Street
Little Rock, AR 72201

Attention: Rosalind Minor

RE: Cancer Specified Disease – Rate Increase
NAIC #62928

Dear Ms. Minor:

Attached for your consideration are revised premiums for the following Cancer Specified Disease Policies:

Form Current Rate Sheet

(As National Travelers

Life Company) Approved New Rate Sheet

(As EMC National

Life Company) Avg Incr

HP8323 1-94 RSH 0421F 8-07 8/6/2007 RSH 0461AR 7-08 40%
HP8323 1-94 RSH 0422F 8-07 8/6/2007 RSH 0462AR 7-08 40%
HP8322 1-94 RSH 0423F 8-07 8/6/2007 RSH 0463AR 7-08 40%
HP8322 1-94 RSH 0424F 8-07 8/6/2007 RSH 0464AR 7-08 40%
HP8323 1-94 RSH 0425F 8-07 8/6/2007 RSH 0465AR 7-08 40%
HP8323 1-94 RSH 0426F 8-07 8/6/2007 RSH 0466AR 7-08 40%
AMH 8328 1-94 RSH 0427F 8-07 8/6/2007 RSH 0467AR 7-08 40%
AMH 8328 1-94 RSH 0428F 8-07 8/6/2007 RSH 0468AR 7-08 40%
AMH 8329 1-94 RSH 0429F 8-07 8/6/2007 RSH 0469AR 7-08 40%
AMH 8329 1-94 RSH 0430F 8-07 8/6/2007 RSH 0470AR 7-08 40%

These policies first became available in 1994 and they were marketed by EMC National Life Company. This is the

<i>SERFF Tracking Number:</i>	<i>EMCN-125730119</i>	<i>State:</i>	<i>Arkansas</i>
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<i>Company Tracking Number:</i>	<i>AR - 10 - 2008</i>		
<i>TOI:</i>	<i>H071 Individual Health - Specified Disease - Limited Benefit</i>	<i>Sub-TOI:</i>	<i>H071.002 Dread Disease</i>
<i>Product Name:</i>	<i>HP8322 & HP8323 et al</i>		
<i>Project Name/Number:</i>	<i>Version 1.0 Rerate 2008/</i>		

eighth revision of rates for these forms.

A description of the policies, premium increase history, and past experience is included in the enclosed Actuarial Memorandum. The anticipated loss ratio is 55%.

We are requesting these rate increases to be implemented with the first premium due on or after 12/1/2008. There are currently 5,219 policy owners nationwide, including 92 Arkansas policy owners that will be affected by this revision.

Your prompt consideration will be greatly appreciated.

Mark C. Rowley, FSA, MAAA
Vice President, Chief Actuary

Company and Contact

Filing Contact Information

Macy Allen, Actuarial Technician
4095 NW Urbandale Drive
Urbandale, IA 50322

Mallen@emcni.com
(515) 345-4210 [Phone]
(515) 345-4165[FAX]

Filing Company Information

EMC National Life Company
4095 NW Urbandale Drive
Urbandale, IA 50322-7914
(515) 645-4000 ext. 4094[Phone]

CoCode: 62928
Group Code:
Group Name:
FEIN Number: 42-0868851

State of Domicile: Iowa
Company Type: L and Health
State ID Number:

Filing Fees

Fee Required?	Yes
Fee Amount:	\$100.00
Retaliatory?	No
Fee Explanation:	\$50 per form x 2 forms = \$100

<i>SERFF Tracking Number:</i>	<i>EMCN-125730119</i>	<i>State:</i>	<i>Arkansas</i>
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<i>Company Tracking Number:</i>	<i>AR - 10 - 2008</i>		
<i>TOI:</i>	<i>H071 Individual Health - Specified Disease - Limited Benefit</i>	<i>Sub-TOI:</i>	<i>H071.002 Dread Disease</i>
<i>Product Name:</i>	<i>HP8322 & HP8323 et al</i>		
<i>Project Name/Number:</i>	<i>Version 1.0 Rerate 2008/</i>		
Per Company:	No		

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
EMC National Life Company	\$100.00	07/17/2008	21466713

SERFF Tracking Number:	EMCN-125730119	State:	Arkansas
Filing Company:	EMC National Life Company	State Tracking Number:	39660
Company Tracking Number:	AR - 10 - 2008		
TOI:	H071 Individual Health - Specified Disease - Limited Benefit	Sub-TOI:	H071.002 Dread Disease
Product Name:	HP8322 & HP8323 et al		
Project Name/Number:	Version 1.0 Rerate 2008/		

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved-Closed	Rosalind Minor	09/11/2008	09/11/2008

Objection Letters and Response Letters

Objection Letters				Response Letters		
Status	Created By	Created On	Date Submitted	Responded By	Created On	Date Submitted
Pending Industry Response	Rosalind Minor	07/18/2008	07/18/2008	Macy Allen	07/18/2008	07/18/2008

Amendments

Item	Schedule	Created By	Created On	Date Submitted
Revised Proposed Rates for HP8322 & HP8323 et al	Rate	Macy Allen	09/11/2008	09/11/2008

Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
Your Note to Reviewer of 9/10/08	Note To Filer	Rosalind Minor	09/11/2008	09/11/2008
Revised Rate Increase Request	Note To Reviewer	Macy Allen	09/10/2008	09/10/2008
Your response to my objection letter	Note To Filer	Rosalind Minor	09/10/2008	09/10/2008

<i>SERFF Tracking Number:</i>	<i>EMCN-125730119</i>	<i>State:</i>	<i>Arkansas</i>
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<i>Company Tracking Number:</i>	<i>AR - 10 - 2008</i>		
<i>TOI:</i>	<i>H071 Individual Health - Specified Disease - Limited Benefit</i>	<i>Sub-TOI:</i>	<i>H071.002 Dread Disease</i>
<i>Product Name:</i>	<i>HP8322 & HP8323 et al</i>		
<i>Project Name/Number:</i>	<i>Version 1.0 Rerate 2008/</i>		

Your response on 7/18/08

Reviewer Note

Rosalind Minor 07/22/2008

<i>SERFF Tracking Number:</i>	<i>EMCN-125730119</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>EMC National Life Company</i>	<i>State Tracking Number:</i>	<i>39660</i>
<i>Company Tracking Number:</i>	<i>AR - 10 - 2008</i>		
<i>TOI:</i>	<i>H071 Individual Health - Specified Disease - Limited Benefit</i>	<i>Sub-TOI:</i>	<i>H071.002 Dread Disease</i>
<i>Product Name:</i>	<i>HP8322 & HP8323 et al</i>		
<i>Project Name/Number:</i>	<i>Version 1.0 Rerate 2008/</i>		

Disposition

Disposition Date: 09/11/2008

Implementation Date:

Status: Approved-Closed

Comment: We have approved a 20% level rate increase on the above policy form. The approval is subject to the following conditions:

1. Rate increases will not be given prior to the first annual anniversary date of any policy.
2. After the first annual anniversary date of any policy, increases will not be given more frequently than once in a twelve (12) month period.
3. All increases in rates, other than change in age or an individual moving to another geographical area, must be submitted to our Department for approval.

Company Name:	Overall % Rate Impact:	Written Premium Change for this Program:	# of Policy Holders Affected for this Program:	Premium:	Maximum % Change (where required):	Minimum % Change (where required):	Overall % Indicated Change:
EMC National Life Company	40.000%	\$94,503	92	\$236,257	40.000%	40.000%	40.000%

SERFF Tracking Number: EMCN-125730119 State: Arkansas

Filing Company: EMC National Life Company State Tracking Number: 39660

Company Tracking Number: AR - 10 - 2008

TOI: H071 Individual Health - Specified Disease - Sub-TOI: H071.002 Dread Disease
Limited Benefit

Product Name: HP8322 & HP8323 et al

Project Name/Number: Version 1.0 Rerate 2008/

Item Type	Item Name	Item Status	Public Access
Supporting Document	Health - Actuarial Justification	Approved-Closed	No
Supporting Document	Cover Letter	Approved-Closed	Yes
Supporting Document	Exhibits 1, 2, and 3	Approved-Closed	No
Rate (revised)	Revised Proposed Rates for HP8322 & HP8323 et al	Approved-Closed	No
Rate	Proposed Rates for HP8322 & HP8323 et al	Withdrawn	No

SERFF Tracking Number: EMCN-125730119 State: Arkansas
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TOI: H071 Individual Health - Specified Disease - Sub-TOI: H071.002 Dread Disease
Limited Benefit
Product Name: HP8322 & HP8323 et al
Project Name/Number: Version 1.0 Rerate 2008/

Objection Letter

Objection Letter Status Pending Industry Response
Objection Letter Date 07/18/2008
Submitted Date 07/18/2008
Respond By Date
Dear Macy Allen,

This will acknowledge receipt of the captioned filing.

Objection 1

- Health - Actuarial Justification (Supporting Document)

Comment: Based on the fact that the Arkansas experience is not credible, the policyholders have received seven substantial rate increases since 2000, and the impact that another increase would have on the insureds, our Department will consider a 20% increase in lieu of the 40% requested.

If this adjustment is accepted, please provide an updated actuarial memo along with the rates.

Please feel free to contact me if you have questions.

Sincerely,
Rosalind Minor

Response Letter

Response Letter Status Submitted to State
Response Letter Date 07/18/2008
Submitted Date 07/18/2008

Dear Rosalind Minor,

Comments:

Response 1

Comments: Thank you very much for your prompt response. So that we may gain a better understanding of the process, may we ask for the calculation used to determine the 20%? We appreciate your help in this matter.

Sincerely,

SERFF Tracking Number: *EMCN-125730119* *State:* *Arkansas*
Filing Company: *EMC National Life Company* *State Tracking Number:* *39660*
Company Tracking Number: *AR - 10 - 2008*
TOI: *H071 Individual Health - Specified Disease - Limited Benefit* *Sub-TOI:* *H071.002 Dread Disease*
Product Name: *HP8322 & HP8323 et al*
Project Name/Number: *Version 1.0 Rerate 2008/*

Macy K. Allen
Actuarial Technician

Related Objection 1

Applies To:

- Health - Actuarial Justification (Supporting Document)

Comment:

Based on the fact that the Arkansas experience is not credible, the policyholders have received seven substantial rate increases since 2000, and the impact that another increase would have on the insureds, our Department will consider a 20% increase in lieu of the 40% requested.

If this adjustment is accepted, please provide an updated actuarial memo along with the rates.

Changed Items:

No Supporting Documents changed.

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Sincerely,
Macy Allen

SERFF Tracking Number: EMCN-125730119 State: Arkansas
Filing Company: EMC National Life Company State Tracking Number: 39660
Company Tracking Number: AR - 10 - 2008
TOI: H071 Individual Health - Specified Disease - Sub-TOI: H071.002 Dread Disease
Limited Benefit
Product Name: HP8322 & HP8323 et al
Project Name/Number: Version 1.0 Rerate 2008/

Amendment Letter

Amendment Date:

Submitted Date: 09/11/2008

Comments:

As a follow up to your objection letter (from 7/18/08) and the series of Notes to Filer/Reviewer that followed, we wish to revise our requested increase from 40% to 20%. We intend to implement this increase on 1/1/2009. Please note that we have uploaded revised rate sheets that reflect the 20% increase.

Thank you for your consideration in this important matter. If you should have any questions/concerns, please do not hesitate to ask.

Sincerely,

Macy K. Allen

Actuarial Technician

Changed Items:

Rate/Rule Schedule Item Changes:

Document Name:	Affected Form Numbers: (Comma Separated list)	Rate Action:	Rate Action Information:	Attach Document:
Revised Proposed Rates for HP8322 & HP8323 et al	RSH 0461AR 7-08, RSH 0462AR 7-08, RSH 0463AR 7-08, RSH 0464AR 7-08, RSH 0465AR 7-08, RSH 0466AR 7-08, RSH 0467AR 7-08, RSH 0468AR 7-08, RSH 0469AR 7-08, RSH 0470AR 7-08	Revised	Previous State Filing Number:	Revised Proposed Rates - AR.pdf
Revised Proposed Rates - AR.pdf			Percent Rate Change Request: 20	

SERFF Tracking Number: EMCN-125730119 State: Arkansas
Filing Company: EMC National Life Company State Tracking Number: 39660
Company Tracking Number: AR - 10 - 2008
TOI: H071 Individual Health - Specified Disease - Sub-TOI: H071.002 Dread Disease
Limited Benefit
Product Name: HP8322 & HP8323 et al
Project Name/Number: Version 1.0 Rerate 2008/

Note To Reviewer

Created By:

Macy Allen on 09/10/2008 02:59 PM

Subject:

Revised Rate Increase Request

Comments:

Since it has been indicated that the Department will only consider a maximum of a 20% rate increase, we would like to modify our filing to request a series of two 20% rate increases to be implemented January, 2009 and January 2010.

We also reserve the right to ask for a higher rate increase percentage in January, 2010, if experience deteriorates further. In that case, we would file the additional request and present evidence of the deteriorating experience. If that is not the case, we would implement in January, 2010, without additional filing, only the second of the two 20% rate increases requested here.

We appreciate your consideration in this important matter.

Sincerely,

Macy K. Allen

Note To Filer

Rosalind Minor on 09/10/2008 02:02 PM

Your response to my objection letter

On 7/18/08, you responded to my objection letter.

I in turn sent to you what I thought was a NOTE TO FILER, but realized today that I did a Reviewer Note which you do not see. I apologize.

Based on my comments outlined on 7/18/08, it is our Department's position that any rate increase above the 20% would not be in the best interest of the policyholders. Our position is based on the past increases and not on a calculation used.

Thank you for your understanding in this matter.

SERFF Tracking Number: *EMCN-125730119* *State:* *Arkansas*
Filing Company: *EMC National Life Company* *State Tracking Number:* *39660*
Company Tracking Number: *AR - 10 - 2008*
TOI: *H071 Individual Health - Specified Disease - Limited Benefit* *Sub-TOI:* *H071.002 Dread Disease*
Product Name: *HP8322 & HP8323 et al*
Project Name/Number: *Version 1.0 Rerate 2008/*

Reviewer Note

Created By:

Rosalind Minor on 07/22/2008 10:27 AM

Subject:

Your response on 7/18/08

Comments:

Based on my comments outlined on 7/18/08, it is our Department's position that any rate increase above the 20% would not be in the best interest of the policyholders.

Our position is based on the past increases and not on a calculation used.

We appreciate your understanding and cooperaiton in this matter.

SERFF Tracking Number:	EMCN-125730119	State:	Arkansas
Filing Company:	EMC National Life Company	State Tracking Number:	39660
Company Tracking Number:	AR - 10 - 2008		
TOI:	H071 Individual Health - Specified Disease - Limited Benefit	Sub-TOI:	H071.002 Dread Disease
Product Name:	HP8322 & HP8323 et al		
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Rate Information

Rate data applies to filing.

Filing Method:	SERFF
Rate Change Type:	Increase
Overall Percentage of Last Rate Revision:	40.000%
Effective Date of Last Rate Revision:	12/01/2007
Filing Method of Last Filing:	PAPER

Company Rate Information

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	# of Policy Holders Affected for this Program:	Premium:	Maximum % Change (where required):	Minimum % Change (where required):
EMC National Life Company	40.000%	40.000%	\$94,503	92	\$236,257	40.000%	40.000%

SERFF Tracking Number:	EMCN-125730119	State:	Arkansas
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Supporting Document Schedules

		Review Status:	
Satisfied -Name:	Cover Letter	Approved-Closed	09/11/2008
Comments:			
For your convenience, a cover letter corresponding to the filing has been included.			
Attachment:			
Cover Letter - AR.pdf			

July 16, 2008

Hon. Julie Benafield Bowman
Commissioner of Insurance
Arkansas Insurance Department
Life and Health Division
1200 West 3rd Street
Little Rock, AR 72201

Attention: Rosalind Minor

RE: Cancer Specified Disease – Rate Increase
NAIC #62928

Dear Ms. Minor:

Attached for your consideration are revised premiums for the following Cancer Specified Disease Policies:

Form	Current Rate Sheet (As National Travelers Life Company)	Approved	New Rate Sheet (As EMC National Life Company)	Avg Incr
HP8323 1-94	RSH 0421F 8-07	8/6/2007	RSH 0461AR 7-08	40%
HP8323 1-94	RSH 0422F 8-07	8/6/2007	RSH 0462AR 7-08	40%
HP8322 1-94	RSH 0423F 8-07	8/6/2007	RSH 0463AR 7-08	40%
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AMH 8328 1-94	RSH 0428F 8-07	8/6/2007	RSH 0468AR 7-08	40%
AMH 8329 1-94	RSH 0429F 8-07	8/6/2007	RSH 0469AR 7-08	40%
AMH 8329 1-94	RSH 0430F 8-07	8/6/2007	RSH 0470AR 7-08	40%

These policies first became available in 1994 and they were marketed by EMC National Life Company. This is the eighth revision of rates for these forms.

A description of the policies, premium increase history, and past experience is included in the enclosed Actuarial Memorandum. The anticipated loss ratio is 55%.

We are requesting these rate increases to be implemented with the first premium due on or after 12/1/2008. There are currently 5,219 policy owners nationwide, including 92 Arkansas policy owners that will be affected by this revision.

Your prompt consideration will be greatly appreciated.



Mark C. Rowley, FSA, MAAA
Vice President, Chief Actuary